

James E. Cecchi
CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.
5 Becker Farm Road
Roseland, New Jersey 07068
Tel: (973) 994-1700

Counsel for Plaintiffs and the Class
[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: MERCEDES-BENZ
EMISSIONS LITIGATION

Civil Action No. 2:16-0881 (KM) (ESK)

NOTICE OF MOTION

To: All Counsel by ECF

COUNSEL:

PLEASE TAKE NOTICE that on July 12, 2021, at 10:30 a.m. at the United States District Court for the District of New Jersey, located at the Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, Plaintiffs will respectfully move the Court for entry of Orders, consistent with the Court's preliminary approval Orders entered on September 16, 2020 and October 21, 2020, under Rule 23 of the Federal Rules of Civil Procedure that (1) grants final approval of the Settlements; (2) certifies the Settlement Class; (3) finds that Notice to the Class was directed reasonably and satisfies due process; (4) confirms appointment of Class Counsel, the Settlement Class Representatives, and the

Settlement Administrator; (5) grants Plaintiffs' requests for attorneys' fees, expenses, and service awards; (6) reserves jurisdiction over the Settlements and their implementation and enforcement; and (7) enters final judgment.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, the undersigned intend to rely on the accompanying Memorandum of Law and supporting Declaration of Jennifer M. Keough, along with the submissions filed in support of Plaintiffs' Motions for Preliminary Approval and Motion for Award of Attorneys' Fees and Costs, as well as arguments of counsel and all records on file.

PLEASE TAKE FURTHER NOTICE that proposed forms of Final Approval Order and Final Judgment consistent with the submissions in support of the Motions for Preliminary Approval will be provided.

Dated: June 21, 2021

Respectfully submitted,

CARELLA BYRNE CECCHI
OLSTEIN BRODY & AGNELLO, P.C.

By: /s/ James E. Cecchi
JAMES E. CECCHI

By /s/ Steve W. Berman

STEVE W. BERMAN

Sean R. Matt

HAGENS BERMAN SOBOL SHAPIRO LLP

1918 8th Avenue, Suite 3300

Seattle, Washington 98101

Tel: (206) 623-7292

By /s/ Christopher A. Seeger

CHRISTOPHER A. SEEGER

SEEGER WEISS LLP

55 Challenger Road

Ridgefield Park, New Jersey 07660

Tel: (973) 639-9100

*Counsel for Plaintiffs and the
Class*